

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 4:17-cr-00100-NAB
)	
COLLIN MCATEE,)	
)	
Defendant)	

MOTION TO TRAVEL

COMES NOW defendant, Collin McAtee (“Defendant”), by and through counsel, and moves this Court for permission to travel to Liberia, Costa Rica from March 17, 2019 to March 24, 2019. In support of this motion (the “Motion”), Defendant states as follows:

1. Defendant files this Motion to request permission to travel with his wife, kids and two other families to Liberia, Costa Rica from March 17, 2019 to March 24, 2019 for family vacation.
2. The conditions of release set in this case prohibit travel by the Defendant outside this district, and moreover prohibit international travel, without prior authorization from the Court.
3. Their travel itinerary is attached to this Motion as Exhibit A.
4. Defendant’s return to the United States following the family vacation is assured by, among other things, the fact that Defendant’s children go to school in St. Louis, and Defendant’s home, property, and business are in the United States.
5. Defendant is not a flight risk and has simply pled guilty to 21 USC§331(a) and 21

USC§331(a)(1), both misdemeanor offenses.

6. If permitted to travel, Defendant will provide the address and phone number of where he will be staying to his U.S. Pretrial Services Officer in advance of March 17, 2019, and will maintain contact as directed during his travel. Defendant will immediately surrender his passport, upon his return to the United States.

7. Defendant, through counsel, has discussed this proposed travel with his Pretrial Services officer, William Irby, and has been informed that Pretrial Services is not opposed to Defendant's request.

8. Defendant, through counsel, has discussed this matter with counsel for the Government, assistant United States Attorney Charles S. Birmingham, who defers to pretrial services regarding this request.

WHEREFORE, Defendant respectfully requests this Honorable Court grant the Motion and permit Defendant to travel with his family to Costa Rica for family vacation.

Dated: February 12, 2019

Respectfully submitted,

ROGERS SEVASTIANOS & BANTE, LLP

By: /s/ John P. Rogers
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CERTIFICATE OF SERVICE

By signature below, I hereby certify that on February 12, 2019, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Assistant United States Attorneys Charles S. Birmingham.

/s/ John P. Rogers